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**PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN  
ELECTRIC POWER COMPANY FOR  
AUTHORITY TO CHANGE RATES**

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**PUBLIC UTILITY COMMISSION  
OF TEXAS**

**MOTION TO INTERVENE OF THE  
CITIES ADVOCATING REASONABLE DEREGULATION**

**NOW COMES** Cities Advocating Reasonable Deregulation<sup>1</sup> ("CARD") and file their motion to intervene, and in support thereof shows as follows:

1. CARD is a coalition of municipalities located in the service territory of Southwestern Electric Power Company ("SWEPCO"). CARD was formed to address the municipalities' concerns with, and interest in, utility rates, services, and operations. CARD, its residents, and businesses located within city limits may be adversely impacted by the outcome of this proceeding.
2. CARD consists of regulatory authorities with standing to participate in this proceeding pursuant to the Public Utility Regulatory Act ("PURA"), Section 33.025 and the Commission's Procedural Rules 22.103(b) and 22.104. CARD hereby requests that the Commission and all parties to this proceeding serve copies of all filings and submissions, whether notices, correspondence, pleadings, briefs or other documents upon the CARD's designated representative.
3. CARD's authorized representatives in this matter are:

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Brennan J. Foley  
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<sup>1</sup> CARD includes the Cities of Atlanta, Center, Daingerfield, Gladewater, Hawkins, Henderson, Kilgore, Longview, Marshall, Mineola, Mt. Enterprise, Mt. Pleasant, Naples, New London, Pittsburg, Waskom, Wellington, White Oak, Winnsboro and Winona.

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4. The Commission has jurisdiction over the parties and subject matter of this intervention pursuant to Chapters 33 and 36 of the Public Utility Regulatory Act (“PURA” or the “Act”) as well as other provisions of the Act.

**WHEREFORE**, CARD respectfully requests the entry of the Your Honor’s order granting the CARD leave to intervene as a party.

Respectfully submitted,

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By: /s/Sergio Herrera

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**ATTORNEYS FOR CITIES ADVOCATING  
REASONABLE DEREGULATION**

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 22nd day of October, 2020, a true and correct copy of the *Motion to Intervene of the Cities Advocating Reasonable Deregulation* was served upon all parties of record by facsimile and/or First-class United States mail, postage paid.

By: /s/Leslie Lindsey  
Leslie Lindsey